



Attorneys at Law

L'Abbate, Balkan, Colavita & Contini, L.L.P.

3 Huntington Quadrangle, Suite 102S, Melville, New York 11747

T.516.294.8844 F.516.294.8202

www.lbcclaw.com

James D. Spithogiannis

Partner

jspithogiannis@lbcclaw.com

Direct Dial: (516) 837-7464

May 13, 2025

VIA ECF

Hon. Nusrat J. Choudhury
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 1020
Central Islip, New York 11722

Re: *Deo, et al. v. Baron, et al.*
Case No. 2:24-cv-06903 (NJC) (JMW)

Dear Judge Choudhury:

We represent Defendant Milman Labuda Law Group PLLC ("Milman") in the above-captioned action and write in response to the Court's May 9, 2025, Order permitting Milman to state its position on whether this Court has any basis for exercising subject matter jurisdiction over this action, including the applicability of the mirror-image rule. Milman's position is that this Court has subject matter jurisdiction over this action under the mirror-image rule, for the reasons set forth in other Defendants' letters to the Court. *See* Dkt. Nos. 74, 87.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink that reads 'James D. Spithogiannis'.

James D. Spithogiannis

JDS/aml

cc: All Counsel of Record (via ECF)